

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

ABDULLAH KHALIL ISMAEL
DEVAUGHN MICHELLE,
ANDRE JOEL WHITE, JR., AND
AARON ISAIAH DEVAUGHN WHITE,
DEFENDANTS.

Criminal No. 1:24-mj-293

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Paris Capalupo, a Detective with the Montgomery County Department of Police (“MCPD”), and a Deputized Task Force Officer with the Federal Bureau of Investigation (“FBI”), being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been a sworn law enforcement officer since 2003 and a deputized Task Force Officer (“TFO”) with the FBI since January 2018. I am currently assigned to the MCPD Major Crimes Division and FBI Baltimore Squad C-8. I have been involved in the investigation of criminal violations relating to violent crimes, including robberies of commercial businesses, federally insured financial institutions, and carjackings. As a TFO, I am a law enforcement officer empowered by law to conduct investigations of, and make arrests for, offenses enumerated in Title 18 of the United States Code.

2. This affidavit is submitted in support of the attached complaints and arrest warrants. I respectfully submit that, based on the facts set forth herein, there is probable cause to believe that Abdullah Khalil Ismael DeV Vaughn MICHELLE (“MICHELLE”), Andre Joel WHITE, JR.

(“**Andre WHITE**”) and Aaron Isaiah DeVaughn WHITE (“**Aaron WHITE**”) violated 18 U.S.C. § 1951(a) (conspiracy to interfere with commerce by robbery).

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the issuance of criminal complaints and arrest warrants, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause. I have not, however, excluded any information known to me that would defeat a determination of probable cause. The information contained in this affidavit is based upon my personal knowledge, my review of documents and other evidence, and my conversations with other law enforcement officers and other individuals. All conversations and statements described in this affidavit are related in substance and in part unless otherwise indicated.

PROBABLE CAUSE

A. September 12, 2023: 7-Eleven Armed Robbery, Sunoco Attempted Robbery, and Shell Armed Robbery

4. On September 12, 2023, at approximately 12:50 a.m., MCP officers responded to a reported armed robbery at the 7-Eleven located at 12301 Middlebrook Road, Germantown, Maryland. Initial investigation, including victim interviews and review of surveillance video, revealed the following:

- a. At approximately 12:46 a.m., two black males entered the store. The first male to enter the store, “Suspect 1,” was wearing a black mask, a black short-sleeve, V-neck tee-shirt, gloves, black pants, and black shoes; the second male, “Suspect 2,” was wearing a black mask, what appeared to be a black hooded sweatshirt with a triangular logo on the left breast, gloves, and black shoes.

- b. Upon entering the store, Suspect 1 immediately pointed what appears to be a black gun with a black slide and a silver ejection port at the store employee behind the counter; Suspect 1 then jumped over the counter, forced the employee at gunpoint to open the two cash registers, from which Suspect 1 removed approximately \$170, and demanded the employee open the store's safe.
- c. Meanwhile, Suspect 2 grabbed a second store employee, knocked her to the ground, and repeatedly punched her. Suspect 2 rummaged through her pockets and stole her cellphone.
- d. After the employee behind the cashier counter was unable to open the safe, the two suspects fled the store.
- e. An employee observed the suspects jumping into a white pickup truck that was approximately 100-200 yards from the store. Surveillance video revealed the white truck had distinctive yellow or amber lights on its roof.

5. Later that morning, September 12, 2023, at approximately 5:50 a.m., an employee inside of the convenience store of the Sunoco gas station located at 12709 James Monroe Highway, Leesburg, Virginia, observed a white pick-up truck park across the street and two black males in black masks approach the store. Fearing the men were there to rob the store, the employee quickly locked the doors. After pulling on the doors and discovering them locked, the two masked males ran to the other end of the gas station, where surveillance video captured one of the suspects pointed south, towards the direction of the Shell gas station discussed below. The two suspects, in both their physical characteristics and clothing, matched those of the two suspects who had robbed the 7-Eleven approximately five hours earlier.

6. About two minutes after the apparent failed attempt to rob the Sunoco, at approximately 5:52 a.m. (still on the same date, September 12, 2023), a white pickup truck with amber/yellow lights on the roof of its cab entered a gravel lot next to the Shell gas station located at 14425 James Monroe Highway, Leesburg, Virginia. Surveillance footage captured the two suspects wearing identical clothing as worn by the suspects during the 7-Eleven robbery and the attempted robbery of the Sunoco, including the black hooded sweatshirt with a triangular logo on the left breast. Upon entering the business, Suspect 1 produced what appears to be the same handgun he had used in the 7-Eleven robbery, pointed it at a customer in the aisleway, then jumped over the sales counter, where he pointed the handgun at an employee, demanded cash, and stole approximately \$200 from the register. Suspect 2, meanwhile, took the customer's cellphone and then jumped over the sales counter and stole 10 cartons of Newport cigarettes. The two then fled the store and ran towards the area where the pickup truck was parked.

7. Law enforcement officers obtained search warrants for phone carrier records for the date, times, and locations of the 7-Eleven armed robbery, the Sunoco attempted robbery, and the Shell armed robbery. T-Mobile provided responsive records that revealed two International Mobile Subscriber Identity ("IMSI") numbers that were in each area during the times of each respective incident. An IMSI number is a unique 14-15 digit number that mobile network operators, such as T-Mobile, use to identify individual subscribers. An IMSI number is a key component of a Subscribers Identity Module, better known as a SIM. Every cellular-enabled device has an IMSI number stored within its SIM card. When the device attempts to connect to a mobile network, such as T-Mobile, the mobile network uses the IMSI to authenticate the device.

8. In response to subsequent search warrants, T-Mobile provided records, including subscriber information and the phone numbers associated with the two IMSI numbers that were

found to be present during each of the above-described incidents. Those records revealed that one of the IMSI numbers was associated with the phone number (202) 983-1784, which was registered to MICHELLE (“MICHELLE’s phone”), while the other was associated with the phone number (202) 340-1581, which was registered to Andre WHITE (“Andre WHITE’s phone”).

9. Law enforcement databases were queried, and Andre WHITE’s and MICHELLE’s physical descriptors are very similar to the suspects observed during the Germantown, Maryland and Leesburg, Virginia robberies. Both have previous arrests for robbery, assault, and firearms violations. Historical location data records for the mobile numbers subscribed by Andre WHITE and MICHELLE were reviewed. The records show the phones subscribed to by Andre WHITE and MICHELLE to be at the location of the 7-Eleven, armed robbery on September 12, 2023, in Germantown, Maryland, during the time of the armed robbery. The records further show the phones to be at the location of the attempted armed robbery and completed armed robbery in Leesburg, Virginia later that same morning.

10. Law enforcement officers queried Andre WHITE and MICHELLE through Facebook and Instagram. Law enforcement officers found two Facebook pages operated by MICHELLE: www.facebook.com/100007838851729 (titled “Abdullah Khalil Ibn-Michelle”), and www.facebook.com/100066628699835 (titled “Easy Peasy Contractors”). Both Facebook pages contained multiple “selfies” (self-taken photographs) of MICHELLE. On the Facebook page titled as “Easy Peasy Contractors,” a photo of MICHELLE wearing a black sweatshirt with a black exterior hood and a gray interior lining and with a triangular logo on the left breast, just as worn by Suspect 2 during the September 12, 2023 robberies, was posted to the Facebook page on June 17, 2023.

11. Law enforcement officers also found a Facebook page operated by Andre WHITE: www.facebook.com/100009138466510. The main photo on the account was a photo of Andre WHITE, and WHITE's Facebook account was on the "Friends list" of MICHELLE's Facebook page.

12. Law enforcement officers found MICHELLE's Instagram account, identified by username "newage_oleskool." The Instagram page contained the same photo of MICHELLE wearing the same distinctive hoodie discussed above, which, like the Facebook photo, was uploaded on June 17, 2023. Law enforcement officers also found Andre WHITE's Instagram account, identified by username "drewwhite420." The main photo of the Instagram account was a photo of Andre WHITE wearing a plain black, V-neck, short-sleeve T-shirt. The shirt that Suspect 1 wore during the robbery on September 12, 2023, was also a plain black, V-neck short-sleeve T-shirt, however a review of the Andre WHITE's photo in the short-sleeve shirt revealed that, although his physical attributes otherwise seemingly matched, he could not have been Suspect 1: as captured in the photo of Andre WHITE, he has noticeable tattoos on his arms, while Suspect 1, as captured on surveillance video, does not.

13. The historical location data of Andre WHITE and MICHELLE's phone records establish that Andre WHITE and MICHELLE's phones were together during the September 12, 2023 offenses but, believing MICHELLE to be Suspect 2 and having ruled out Andre WHITE as Suspect 1, law enforcement officers suspected that Andre WHITE was most likely the "getaway driver," and that a third suspect was involved. Law enforcement officers therefore re-analyzed the tower dump records and the phone records and discovered a phone number that appeared on the call detail records of the tower dump records a few minutes after the final robbery on September

12, 2023. Law enforcement officers found the same phone number on Andre WHITE's phone records a day before and a day after the robbery. That phone number was (202) 597-7139.

14. A query of phone number (202) 597-7139 revealed that it was a T-Mobile phone number, belonging to Aaron WHITE. A query of Aaron WHITE through law enforcement databases revealed that Aaron WHITE matched the height, build, and complexion of Suspect 1, and has provided his phone number to law enforcement as (202) 597-7139. A social media search of Aaron WHITE uncovered photos of him that revealed, just like Suspect 1, he does not have tattoos on his arms. Investigation further revealed that Aaron WHITE, Andre WHITE, and Abdullah MICHELLE are all brothers.

15. Law enforcement officers obtained Aaron WHITE's call detail records, which revealed that the phone subscribed to Aaron WHITE ("Aaron WHITE's phone") was turned off at the time of the three September 12, 2023 offenses, but that it was turned on sometime shortly after the final offense, as it communicated with a tower just a few minutes after the Shell armed robbery, just a short distance from the store. A review of the records showed the phone registered to Aaron WHITE to be off at the time of the September 12, 2023, Germantown, Maryland and Leesburg, Virginia armed robberies. However, Aaron WHITE's phone communicates with a tower just a few minutes after the Leesburg, Virginia robberies, a short distance away from the robberies.

B. December 4, 2023: Motor Vehicle Theft

16. On December 4, 2023, at approximately 11:28 p.m., officers from the Metropolitan Police Department ("MPD") responded to the Capitol Hilton Hotel located at 1001 16th Street, NW, Washington, D.C., due to a report of a stolen vehicle. MPD's investigation determined the victim, a ride-share driver for Lyft, was assisting his passengers with retrieving their luggage from the trunk of the vehicle, when an unknown male got into the driver's seat and sped away. The

stolen vehicle was a 2018 gray Toyota Camry with Virginia registration TRX-7381. MPD entered the stolen vehicle's registration plate into the National Crime Information Center ("NCIC"). NCIC is a national criminal records database allowing law enforcement agencies to enter or search for stolen property, wanted persons, and other criminal justice related items.

17. Cell site location data reveals that MICHELLE's phone was in the general area of the Capitol Hilton Hotel at the time of the auto theft.

C. December 4, 2023: Tobacco Mart Armed Robbery

18. On December 4, 2023, at approximately 10:51 p.m., an employee at the Tabacco Mart located at 5707 Seminary Road, Falls Church, Virginia, was robbed at gunpoint. According to the employee, he was counting the register's money in preparation of closing the store when three suspects entered the front door of the business. One suspect, who was armed with a handgun, jumped over the sales counter and demanded cash. After taking approximately \$700 from the register, the suspect forced the employee to the back of the store, where he then demanded that the employee open the store's safe. The employee, however, did not have access to the safe. Meanwhile, the other two suspects loaded up approximately 150 cartons of Newport cigarettes, valued at \$12,500, in plastic bags. One of the suspects stole the employee's phone. The suspects were described as black males dressed in all black clothing.

19. Surveillance footage from a nearby business revealed that the three suspects arrived and fled in a gray Toyota Camry with Virginia registration TRX-7381—the same vehicle that had just been stolen from Washington, D.C.

20. Cell site location data shows that MICHELLE's phone, Andre WHITE's phone, and Aaron WHITE's phone were all in the general area of the store at the time of the robbery.

D. December 13, 2023: Lockett's Mini Mart Armed Robbery

21. On December 13, 2023, at approximately 11:45 p.m., the Lockett's Mini Mart located at 14425 James Monroe Highway, Leesburg, Virginia, was robbed at gunpoint. One of the employees reported that he was walking outside of the store when two suspects, one of whom was armed with a gun and the other of whom was armed with a knife and a baton, got out of a silver vehicle and forced the employee back into the store. Once inside of the store, the suspect with the gun pointed it at employees and stole approximately \$1,000 in cash from the register and a metal cash box. The suspects stole over 40 cartons of Newport cigarettes before fleeing the store. In his haste, the suspect who had been armed with a knife and baton left both of these items behind the counter when he fled. The suspects were described as black males dressed in all black clothing.

22. Surveillance video revealed that the suspects arrived and fled in the same stolen Toyota Camry that had been used in the December 4, 2023 armed robbery. The Toyota Camry was located and recovered unoccupied a short distance away from the robbery after evidently hitting a curb and becoming disabled.

23. Cell site location evidence shows MICHELLE's phone and Andre WHITE's phone were both in the general area of the store at the time of the robbery.

E. January 28, 2024: Tobacco Bazaar Armed Robbery

24. On January 28, 2024, at approximately 8:45 p.m., an employee of the Tobacco Bazaar, located at 7327 Richmond Highway, Alexandria, Virginia was robbed at gunpoint. The employee reported that two suspects entered the store: one suspect jumped over the counter and the second suspect, who produced a small baseball bat or baton-style object, attempted to jump over the counter but was unable to make it over. The unarmed suspect grabbed the employee by the back of his shirt and forced him to the rear of the store, where the suspect loaded up a large

plastic bag with at least 25 cartons of Newport cigarettes. The suspect stole the employee's mobile phone. Meanwhile, the armed suspect stole approximately \$220 from the store's cash register. After the employee informed the suspects that he did not have access to the store's safe, the two suspects pushed the safe, which contained approximately \$3,000 in cash, out of the back door. After about a minute, one suspect came back into the business to retrieve the bat/baton he left at the front counter and then fled from the business. The suspects were described as black males dressed in black clothing, black face masks, and wearing gloves.

25. Cell site location data shows MICHELLE'S phone in the general area of this store at the time of the robbery. Cell site location data further reveals that Andre WHITE's phone was communicating with towers elsewhere at the time of the robbery, and that Aaron WHITE's phone produced no data at the time of the robbery, suggesting that his phone may have been turned off.

F. January 31, 2024: Tobacco Hub Armed Robbery

26. On January 31, 2024, an employee at the Tobacco Hub located at 4593 James Madison Highway, King George, Virginia, reported that he had been robbed at gunpoint. According to the employee, at approximately 8:49 p.m. that night, two suspects entered the front door, pushed him into a back room of the business, threw his cellphone so that he could not access it, and bound his hands behind his back with a black plastic zip tie. The suspects demanded cash and the location of the safe. The suspects ended up stealing the safe, which contained approximately \$3,500, along with \$900 from the employee's pockets, \$561 in cash from the register, and 118 cartons of Newport cigarettes and 275 packs of Newport cigarettes (valued at over \$10,000), which were loaded into large plastic bags. The suspects fled out of the back door of the business and into what looked like a rental van.

27. Surveillance video corroborated the employee's account and revealed the following additional details:

- a. The first suspect who entered the store wore a black backpack and what appears to be the same black hoodie with a gray triangular logo on the left breast that was worn during the three robberies on September 12th and featured in a photo posted on MICHELLE's social media. This suspect had a hood pulled over his head, a black mask covering his face other than his eyes and the bridge of his nose and wore gloves. This suspect's stocky build and height is consistent with MICHELLE's build and height.
- b. The other suspect carried a glossy blue bag into the store and was wearing: a black jacket on top of a black hoodie with a gray liner; a black mask that covered everything but his eyes, eyebrows, and the bridge of his nose; leather gloves; black boots; and gray sweatpants. Law enforcement officers noticed that the gray sweatpants had a unique circular emblem on the left thigh that read "stay down," with a "\$" sign in the middle of it.

28. Surveillance footage from nearby businesses showed the suspects run out of the back of the store and into a white U-Haul van. Area surveillance footage captured images of the U-Haul van with Arizona vehicle registration AL97642.

29. Law enforcement subsequently obtained U-Haul contracts that identified Abdullah Khalil Ismael DeV Vaughn MICHELLE as having rented the U-Haul van out of Washington, D.C., on January 26, 2024. The contract lists (202) 983-1784 as the contact number for the renter and a photograph of MICHELLE was submitted as part of the verification process. The contract further reflects the van's equipment number: BE1135D.

30. After U-Haul was informed of the van's potential involvement in the above-mentioned armed robbery, and the van had still not been returned, a representative for the company reported it as stolen to Metropolitan Police Department, which in turn reported the same into NCIC.

31. Cell site location evidence shows MICHELLE's phone and Aaron WHITE's phone were both in the general area of the store at the time of the robbery.

G. February 12, 2024: Tobacco Variety Armed Robbery

32. On February 12, 2024, at approximately 10:45 p.m., an employee at the Tobacco Variety located at 3370 Leonardtown Road, Waldorf, Maryland was robbed at gunpoint. According to the employee, three black male suspects entered the business wearing masks and dark clothing. One suspect, using his left hand, pointed a silver and black handgun at the employee's face, ordered him to put his mobile phone down, and demanded to know the location of the safe. As captured on surveillance video, this suspect was wearing a black mask with white lines on back of it. After ordering the employee to turn the lights off, the suspects forced him to the register area and ordered him to lay down on the floor. The suspects proceeded to steal approximately \$640 from the cash register, 80 packs and 2 cartons of Newport cigarettes, and the safe which contained approximately \$20. The suspects fled out of the rear door of the business and into a U-Haul van with a stolen Maryland license plate but bearing equipment number BE1135D.

33. Law enforcement recovered several receipts with latent prints from the back parking lot where the suspects had loaded up the U-Haul before fleeing. Subsequent comparison of the latent prints from those receipts and MICHELLE's known prints revealed them to be a match.

34. Cell site location evidence shows MICHELLE's phone, Andre WHITE's phone, and Aaron WHITE's phone were all in the general area of this store at the time of the robbery.

H. February 13, 2024: Arrest of Michelle

35. On February 13, 2024, one day after the Tobacco Hub armed robbery, Forest Heights Police Department patrol officers were alerted through a License Plate Reader ("LPR") hit of a stolen 2023 white U-Haul Ford Transit Van with Arizona registration AL97642 near 5100 Indian Head Highway, Indian Head, Maryland.¹ Officers observed the driver and sole occupant of the U-Haul as he parked the vehicle and then entered a business. Officers then immediately arrested the driver, who was identified as MICHELLE. MICHELLE was holding the keys to the U-Haul when arrested.

36. The U-Haul was searched and a number of items were recovered, including the following:

- a. A black plastic backpack, similar to the one worn by the suspect believed to be MICHELLE during the Tobacco Hub robbery;
- b. Plastic zip ties imprinted with the same number series imprinted on the zip tie recovered from the Tobacco Hub armed robbery;
- c. A blue glossy bag that appears to be the same type carried into the Tobacco Hub;
- d. Ski masks, gloves, and a black hooded sweatshirt with a triangle logo over the left breast, similar to the one believed to have been worn by MICHELLE during the September 12, 2023 offenses; and

¹ LPR's are fixed, or in this case, vehicle mounted cameras that "read" passing by license plates. The computer automatic compares or "runs" the plate numbers through law enforcement databases to include NCIC. If the license plate or vehicle has been reported stolen and entered into NCIC, the LPR will alert the officer.

- e. The stolen license plate affixed to the U-Haul captured on surveillance video from the Tobacco Variety armed robbery the day before.

37. In addition to the items above, law enforcement officials recovered several boxes and cartons of Newport cigarettes. Latent prints from two of the Newport boxes were subsequently identified as belonging to Aaron WHITE. So, too, was a print lifted from U-Haul paperwork recovered from the van.

I. February 28, 2024: Arrest of Andre White

38. On February 28, 2024, Andre WHITE was arrested while driving in his girlfriend's vehicle in Rockville, Maryland, pursuant to an arrest warrant issued by the District Court of Maryland for Montgomery County. At the time of his arrest, Andre WHITE had in his jacket pocket a loaded .40 caliber silver and black Smith and Wesson handgun that appears to be the same handgun used in the February 12, 2024 Tobacco Variety armed robbery. A subsequent search of the vehicle located additional evidence, including Andre WHITE's phone, ammunition, and a black mask with white stripes on it, similar to the one the one worn by the gunman during the February 12, 2024 Tobacco Variety armed robbery, as well as an empty two-pack box for the same type of masks.

39. After being advised of his Miranda rights, Andre WHITE used his left hand to sign a Miranda rights waiver form. As noted, the gunman in the February 12th Tobacco Variety armed robbery held the gun in his left hand.

40. After waiving his rights, Andre WHITE confessed to being the getaway driver for the September 12th robberies of the 7-Eleven and Shell gas station, and the attempted robbery of

the Sunoco gas station. Andre WHITE stated that his two brothers, MICHELLE and Aaron WHITE, were the robbers who went into the stores.²

J. March 1, 2024: Residential Searches

41. On March 1, 2024, law enforcement officials executed search warrants at both MICHELLE and Andre WHITE's respective residences. Black and gray gloves and an additional black hooded sweatshirt with triangle logo above the left breast worn during the September 12, 2023, 7-Eleven, Sunoco, and Shell armed robberies were located in MICHELLE's apartment. Additional mobile phones belonging to Andre WHITE were seized from his apartment.

K. March 20, 2024: Arrest of Aaron WHITE and Search Warrant

42. Aaron WHITE was arrested inside of his residence in Washington, D.C. on March 20, 2024, based upon an arrest warrant issued by the District Court of Maryland for Montgomery County. A subsequent search warrant was executed the same day and a gray and black sweatshirt with a unique circular emblem over the left breast that read "stay down," with a "\$" sign in the middle of it was located in Aaron WHITE's bedroom. This sweatshirt appears to be the matching top to the gray sweatpants observed on surveillance footage during the January 31, 2024, Tobacco Hub robbery. A sawed-off or shortened shotgun was also located hanging on the back of Aaron WHITE'S bedroom door. Aaron WHITE was convicted of Armed Robbery in the Circuit Court for Anne Arundel County Maryland on September 15, 2018.

L. Interstate Commerce

43. The 7-Eleven and Tobacco Variety, both of which are located in the State of Maryland, sell consumer items procured from vendors and distribution centers outside of the State of Maryland.

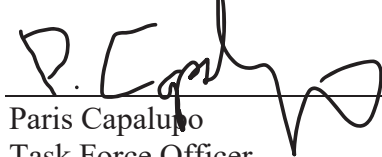
² Andre WHITE was only questioned about the September 12th offenses.

44. The Sunoco and Shell gas stations, the Tobacco Mart, Luckett's Mini Mart, Tobacco Bazaar, Tobacco Hub, all of which are located within the Commonwealth of Virginia, sell consumer items procured from vendors and distribution centers outside of the Commonwealth of Virginia.

CONCLUSION

45. Based upon the foregoing, I submit there is probable cause to believe that from at least September 12, 2023, and continuing up to and including on or about February 12, 2024, Abdullah Khalil Ismael DeVaughn MICHELLE ("MICHELLE"), Andre Joel WHITE, JR. ("Andre WHITE") and Aaron Isaiah DeVaughn WHITE ("Aaron WHITE"), in the Eastern District of Virginia and elsewhere, conspired to interfere with commerce by robbery, in violation of Title 18, United States Code, Section 1951. Accordingly, I respectfully request that a complaint and arrest warrants for MICHELLE, Andre WHITE, and Aaron White be issued.

Respectfully submitted,



Paris Capalupo
Task Force Officer
Federal Bureau of Investigation

Subscribed and sworn to before me on July __, 2024.

Lindsey R Vaala

Digitally signed by Lindsey R Vaala
Date: 2024.07.16 11:48:07 -04'00'

The Honorable Lindsey R. Vaala
United States Magistrate Judge